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February 1, 2007

Hon. Deborah Taylor Tate Commissioner Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: WC Docket No. 06-159

Dear Commissioner Tate:

I saw your testimony before the Senate Commerce Committee today on C-SPAN, and I was pleased to hear you discuss the lessons learned from Hurricane Katrina, particularly the need for additional redundancy in telecommunications network. Thank you for bringing this important issue to the attention of Congress.

As you may know, Neutral Tandem has filed a petition with the FCC that raises crucial public interest issues about redundancy in the switched voice network. As the Nation's only competitive provider of tandem switching and transit services, we have found that connections between the switches of different carriers often have far less robustness and route diversity than the internal connections between switches within a single network. As you recognized, the lack of diversity in these connections poses a real threat to the network in emergency situations, whether due to an outage in a single bottleneck connection or to a spike in traffic that overwhelms the limited capacity connecting two carriers. This threat is becoming ever more pressing to the Nation as the percentage of the aggregate voice traffic handled by non-traditional carriers, including wireless and cable providers, continues to increase.

Our petition asks whether it is "necessary or convenient in the public interest," as contemplated by Section 201(a) of the Communications Act, to require a wireless carrier to allow a connection to its switches for the termination of traffic from a competitive tandem switch, at no expense to the wireless carrier. The concerns you identified in your statement to the Senate Commerce Committee bear directly on this question. Due to the importance of telecommunications survivability to government agencies, our petition has been supported by numerous governmental entities, such as the City of Chicago, the City of New York, and the State of New York Department of Public Service. It has also been supported by many telecommunications carriers, including AT&T.



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We would greatly appreciate your support in encouraging the Chairman to bring this matter before the full Commission quickly for a decision. The Nation's homeland security is at stake, and it can rapidly be improved—at no cost to the public--by granting our petition.

We are scheduled to meet with your advisor, Ian Dillner, to discuss this proceeding on February 22. I understand that you are not available on that date, but I would welcome the opportunity to brief you on this issue, and on Neutral Tandem's role in increasing network diversity and survivability, another time when your calendar permits.

Very truly yours,

Rian Wren

Chief Executive Officer

cc: Marlene H. Dortch, Secretary, FCC